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12 **Attorneys for Plaintiff**
13 **Entropic Communications, LLC**

14 ENTROPIC COMMUNICATIONS, LLC,

15 Plaintiff,

16 v.

17 DISH NETWORK CORPORATION, *et*
al.,

18 Defendants.

19 Case No.: 2:23-cv-01043-JWH-KES
(Lead Case)

20 Case No.: 2:23-cv-01047-JWH-KES
(Related Case)

21 Case No.: 2:23-cv-01048-JWH-KES
(Related Case)

22 Case No.: 2:23-cv-05253-JWH-KES
(Related Case)

23 [Assigned to the Honorable John W.
Holcomb]

24 **REQUEST FOR JUDICIAL NOTICE
IN SUPPORT OF ENTROPIC
COMMUNICATIONS, LLC'S
MOTION TO DISMISS DISH'S
COUNTERCLAIMS**

25 ENTROPIC COMMUNICATIONS, LLC,

26 Plaintiff,

27 v.

28 COX COMMUNICATIONS, INC., *et al.*,

29 Defendants.

1 ENTROPIC COMMUNICATIONS,
2 LLC,

3 Plaintiff,

4 v.

5 COMCAST CORPORATION, *et al.*,

6 Defendants.

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9 ENTROPIC COMMUNICATIONS,
10 LLC,

11 Plaintiff,

12 v.

13 DIRECTV, LLC, *et al.*,

14 Defendants.

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1 **TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 Plaintiff Entropic Communications, LLC (“Entropic”) respectfully requests that
3 the Court take judicial notice of Exhibit A attached to this request.

4 Judicial notice of facts is proper where the facts “can be accurately and readily
5 determined from sources whose accuracy cannot reasonably be questioned.” FED. R.
6 EVID. 201(b)(2). Courts may take judicial notice of matters of public record, as well as
7 documents made publicly available where there is no question as to their authenticity.
8 *Lee v. City of L.A.*, 250 F.3d 668, 688–90 (9th Cir. 2001).

9 This request is made in connection with Entropic’s recently filed Motion to
10 Dismiss Defendants Dish Network Corp., Dish Network LLC, Dish Network Service
11 LLC, Dish Network California Service Corp., and Dish Technologies, LLC’s
12 (collectively, “DISH”) Counterclaims. As detailed in that Motion, DISH’s
13 counterclaims depend on the terms of the MoCA IPR Policy. DISH’s counterclaims
14 rely on a 2011 version of the MoCA IPR Policy, but another version published in 2017
15 “supersedes any and all prior documentation.” See Exhibit A at § 1. Plaintiff asks this
16 Court to take notice of the 2017 version of the MoCA IPR Policy, which is a document
17 that is publicly available on the MoCA Alliance website
18 (<https://mocalliance.org/access/access-overview.php>).

19 Accordingly, Entropic requests that the Court take judicial notice of the
20 following:

- 21 1. MoCA IPR Policy published in 2017, attached hereto as **Exhibit A**.

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24 Dated: February 21, 2024

Respectfully Submitted,

25 By: /s/ Cassidy T. Young
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14 ***Communications, LLC***

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